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**From:** Ashton J. Delauney

**Sent:** Tuesday, June 07, 2005 11:03 AM

**To:** AB85 Comments

**Subject:** Re: Provisions for persons granted limited recognition to prosecute limited patent applications

Commissioner for Patents

USPTO, Alexandria, VA

Dear Sir:

The proposed changes to the rules governing persons granted limited recognition to prosecute limited patent applications are very welcome. I understand that the existing practice is to provide to individuals who have passed the patent examination but are not U.S. citizens or permanent residents a certificate or letter which is to be attached to communications they file with the Patent Office in the course of prosecuting an application. The cumbersome nature of this procedure may itself be a deterrent to its use, and the granting of a limited recognition number seems to be a much neater arrangement.

I wish to make the following two suggestions:

- 1) The number granted to the individuals concerned should simply be a "Recognition No." rather than a "Limited Recognition No." I believe that a granted Recognition No. is sufficiently distinct from a Registration No. to reflect the fact that the grantee is not entitled to receive a Registration No. However, a Recognition No. does not carry the negative connotations of a Limited Recognition No. My concern is that clients, licensees, and others involved in the prosecution of a patent might get the not unreasonable, but false impression that the individual handling the prosecution is not fully qualified to represent the client before the Patent Office since that individual had been granted only limited recognition by the Patent Office.
- 2) The Recognition numbering system should be synchronized with the Registration numbering system such that the numerical value of the Recognition No. is the same as if the recipient had been granted a Registration No. That is, if the recipient of the Recognition No. had been a U.S. citizen and would have been entitled to receive, say, Registration No. 64,382, s/he should be granted Recognition No. 64,382. A

certain number of Recognition No. recipients will invariable become permanent residents or citizens of the U.S., and such individuals should be able to convert their Recognition No. into a Registration No. upon becoming U.S. permanent residents or citizens. Since the numerical value of the Registration No. provides an indication of the length of time an individual has been registered, it would only be fair that someone who initially had a Recognition No. and then changed to a Registration No. should have a Registration No. whose numerical value reflected the length of time that had elapsed since the person had passed the patent examination.

I hope that these suggestions will be given serious consideration and adopted.

Sincerely,

Ashton J. Delauney

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